

### **Drawing Amendments**

Please substitute the attached sheet (labeled "Replacement Sheet") for Figure 22 for the respective sheet originally filed. (Figures 1-21 have been previously amended and accepted.) This Replacement Sheet represents the inadvertently unlabeled formal drawing in this case, as required by the Examiner's Action of December 6, 2005.

### Remarks

Claims 1, 6-9 (dependent on claim 1), 10, and 19-21 were pending prior to the Examiner's Action. Claims 1, 6-9, 10, and 19 were rejected. Claims 20 and 21 were objected to but indicated as allowable if presented in independent form. Here, claims 1, 6, 8, 10, and 20-21 are amended; claim 19 is cancelled in favor of new claim 22; and new claims 23-27 are presented.

The drawing objection noted by the Examiner is addressed in the accompanying replacement drawing. Specifically, Figure 22 is now labeled.

Claims 8 and 10 have been amended to overcome the rejection for indefiniteness and for clarity in the locations noted by the Examiner.

Claims 20 and 21 have been amended to be presented in independent form by incorporating the limitation of their former independent claim 19, and therefore each should be allowable. Claim 19 has been cancelled without prejudice in favor of new claim 22, which differs slightly from former claim 19 but is believed to be patentable as advocated below. New claims 23-24 parallel claims 20-21, respectively, prior to the amendment above to place them in independent form. New claims 25-27 define the configuration of the seal using alternative language not previously used, but supported generally by the specification and drawings such that no new matter has been added. Other amendments to the claims have been made for clarity or to correct obvious typographical errors.

Each amended and newly presented independent claim specifies an aspect of the second surface of the seal component of the invention that is not disclosed or suggested by the references cited in the Examiner's Action. In particular, amended claims 1 and 10 and new claim 22 specify (using applicant's numbering of the preferred embodiment in *italics* solely for purposes of discussion) that the seal 24 lies entirely within recessed seat 82 surrounding aperture 80. New claims 25-27 specify, in various ways, that recessed seat 82 surrounds aperture 80 and that the second poppet be sealed at a location outside

that aperture. Each alternative aspect of the invention is shown in the preferred embodiment illustrated in (notably) Figure 7A.

By contrast, Fort fails to disclose a seal meeting any of these various individual and independent criteria. Fort discloses (using claim element language but Fort's numbering in **bold**) a seal **52** that extends beyond the recessed seat (generally **70, 72, 82**) such that second surface **56** lies within [second poppet] aperture **42**. Whatever radially inwardly directed component there may be to Fort's second surface **56**, it will necessarily lie within the inner diameter of aperture **42** such that second surface **56** seals second poppet **34** radially inwardly within the inner diameter of aperture **42**. Fort does not teach a the seal of this invention, but instead one stretched to extend around the unnumbered shoulder where recessed seat (**70, 72, 82**) ends and aperture **42** begins, thus being held in place by the tension between his "anchoring lug" **80** (inserted into annular groove **82** within aperture **42**) and rims (**64, 66**) on recessed seat (**70, 72, 82**).

Fort expressly teaches away from the invention, because he teaches the ordinary artisan that such features are advantageous: "The lip **80** engages in an annular groove **82** in the valve member **28**. This lip together with the snug fit of the rims **64** and **66** in respective grooves ensures that the annular valve member is held on the valve member." [Column 4, lines 30-34.]

The location and configuration of applicants' seat contributes to the flow characteristics previously noted as described at specification page 8, lines 4-10 (published as paragraph **[0048]**, lines 6-14) and illustrated in Figure 22. Nothing in Fort, alone or in combination with Bowen, would suggest making the modifications required to the Fort design to arrive at the applicants claimed invention, or that such modifications would provide such advantages.

**Conclusion**

Please enter the amendments above and reconsider the application. If you have any questions, please contact me at your convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Peter Forrest', with a large, stylized initial 'P'.

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March 6, 2006

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GP:1850689 v2